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Hearing Date: April 7, 2006 at 10:00 a.m.
Objection Deadline: March 30, 2006 at 4:00 p.m.

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Counsel for Petitioners

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:	:	Chapter 11
DELPHI CORPORATION, et al.,	:	
	:	Case No. 05-44481 (RDD)
Debtors.	:	(Jointly Administered)
	:	

MOTION FOR RELIEF FROM AUTOMATIC STAY FILED BY PETITIONERS,
MARY P. O'NEIL AND LIAM P. O'NEIL

TO THE HONORABLE JUDGE ROBERT D. DRAIN
UNITED STATES BANKRUPTCY JUDGE:

Petitioners, Mary P. O'Neill and Liam P. O'Neill ("Petitioners"), by their attorneys, move this Honorable Court pursuant to 11 U.S.C. §362(d) for relief from the automatic stay in order to proceed with the prosecution of the state court litigation filed against Debtors, Delphi Corporation and Delphi Automotive Systems LLC ("Debtors") and to seek satisfaction of any judgment obtained against Debtors from any insurance

coverage that may be applicable to Petitioners' claims against Debtors, and in support thereof, Petitioners state as follows:

1. Petitioners have a cause of action against Debtors for strict liability, negligence, and breach of express and implied warranties of merchantability relating to the malfunction of the electrical component parts and systems contained in a 2000 General Motors GMC Jimmy sport utility vehicle owned by Petitioners. Petitioners filed a lawsuit in the Circuit Court of Cook County on June 27, 2003.

2. On or about October 21, 2005, Debtors sent a Notice of Commencement of Chapter 11 Bankruptcy Cases regarding Debtors.

3. For the reasons set forth in their Memorandum in support of their Motion for Relief From Stay contemporaneously filed herewith, Petitioners request relief from the automatic stay in order to proceed with the prosecution of the state court litigation filed against Debtors and to seek satisfaction of any judgment obtained against Debtors from any insurance coverage that may be applicable to Petitioners' claims against Debtors.

4. Petitioners agree to limit any recovery on their claims against Debtors to the proceeds of any applicable policy of insurance and agree that any judgment which might be entered in the state court litigation would not be a claim against any other assets of Debtors.

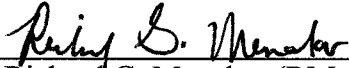
5. The granting of relief from the automatic stay would not create any liability upon Debtors nor would it interfere with the administration of Debtors or the reorganization thereof.

WHEREFORE, Petitioners respectfully request entry of an Order modifying the automatic stay imposed by §362(d) of the Bankruptcy Code to allow Petitioners to proceed with the State Court Litigation, including discovery, filed against Debtors and to seek satisfaction of

any judgment obtained against Debtors from any insurance coverage that may be applicable to
Petitioners' claims against Debtors.

Respectfully submitted,

Petitioners, Mary P. O'Neill and Liam P. O'Neill

By: 
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